UNITED STATES DISTRICT COURT EASTERN DISTRICT OF NEW YORK

PAVEL STETSKO, on behalf of himself and others similarly situated,

Plaintiff,

v.

SINAI I INC. d/b/a SINAI VAN SERVICE and YEFIM PORTNOV, in his individual and professional capacity,

Defendants.

Case No.: 1:25-cv-3222-OEM-VMS

DECLARATION OF INNESSA M. HUOT IN SUPPORT OF REQUEST FOR CERTIFICATE OF DEFAULT

- I, Innessa M. Huot, being duly sworn, deposes and says pursuant to 28 U.S.C. § 1746:
- 1. I am an attorney duly admitted to practice before this Court. I am a partner with Faruqi & Faruqi, LLP, counsel for Plaintiff Pavel Stetsko ("Plaintiff") in the above-captioned matter. I am fully familiar with the files, records, and pleadings in this matter, as well as all other facts and circumstances stated herein.
- 2. I submit this Declaration pursuant to Local Civil Rule 55.1 in support of Plaintiff's Request for Certificate of Default against Defendant Yefim Portnov ("Defendant" or "Portnov").
 - 3. Plaintiff commenced this action by filing a Complaint on June 9, 2025. ECF No. 1.
 - 4. On June 10, 2025, the Court issued a Summons to Defendant. ECF No. 4.
- 5. Plaintiff served Defendant on June 25, 2025 by personally serving an agent authorized to receive service at the company address located at 1224 Brunswick Avenue, 2nd Floor, Far Rockaway, NY 11691, in accordance with the Federal Rules of Civil Procedure ("FRCP"), and an affidavit of service was filed with the Court on June 26, 2025. ECF No. 7.
- 6. The time for Defendant to answer or otherwise move with respect to the Complaint herein expired on July 16, 2025.

7. Defendant has failed to answer or otherwise defend the above-entitled action within

the time period set by the FRCP, and the time for Defendant to answer or otherwise defend the

above-entitled action has not been extended.

8. Defendant is not an infant or incompetent.

9. Defendant is not in the military service of the United States.

10. Defendant has defaulted in the above-captioned action and Plaintiff is therefore

entitled to a Certificate of Default against Defendant.

11. Accordingly, Plaintiff requests that the default of Defendant be noted, and a

Certificate of Default be entered.

12. I declare under penalty of perjury that the foregoing is true and correct to the best

of my knowledge.

Executed on: July 17, 2025

/s/ Innessa M. Huot

Innessa M. Huot